

### **REMARKS/ARGUMENTS**

The Office Action has been carefully considered. The issues raised are traversed and addressed below with reference to the relevant headings and paragraph numbers appearing under the Detailed Action of the Office Action.

In response to the Examiner's objections raised in paragraphs 2 to 9, a number of changes have been made to the claims and we respectfully submit that these help to highlight distinctions between the present invention and the cited prior art.

As far as the changes are concerned, the independent claim 89 has now been deleted from the application to help reduce the number of claims for consideration by the Examiner.

Remaining independent claims 2 and 88 have been amended to clarify that the indicating data is generated using coded data sensed in response to placing of the sensing device in an operative position relative to the interface surface. In addition to this, the claim has been revised to clarify that the indicating data is indicative of the one interactive element and of the movement. Accordingly, this clarifies that the computer system does not receive separate movement data and indicating data as was previously defined in the claim, which we believe rendered the claim unclear.

A basis for these amendments, can be found on page 30 of the specification as filed which specifies that pen actions attached as a series of strokes and that a stroke is initiated by a pen down event. Thus, coded data is sensed when the sensing device is placed in an operative position relative to the interface surface.

This is distinctly different to the printing device described in Dymetman. In particular, Dymetman clearly states in column 9, line 10 that the user clicks a button on the pointer 502. Figure 12 clarifies that the sensing device responds to the user click to get the page ID and location. Thus, the sensing device in Dymetman does not sense coded data in response to placing of the sensing device in an operative position but rather senses coded data in response to activation of a button by the user.

We respectfully submit that this has a major implication on the manner in which the invention operates. In particular, in Dymetman the intention is that the user will simply position the pen on the page and then press the button to cause a click and thereby determine the location of the pen. The intention is therefore that the pen is used as a discrete pointing device to determine discrete locations on the document in response to clicks. We would therefore submit that this is not suited for determining movement of the sensing device especially with regard to the determination of handwriting or the like, which would require repeated clicking during a stroke.

In contrast to this, the present invention, as set out in claims 1 and 88, is adapted to sense indicating data indicative of movement of the sensing device relative to the interface surface. This movement is detected when the sensing device is placed in the operative position automatically and does not require a user click. Furthermore, the movement is determined automatically and not in response to clicking at a number discrete locations.

Thus, we do not believe that Dymetman discloses sensing coded data in response to placing of a sensing device in an operative position, or generating coded data representative of at least one interactive element and movement of the sensing device.

In view of this, we believe that claims 2 and 88 are both novel and inventive over Dymetman.

In order to further highlight the distinctions between the invention and the prior art, new claims 179 to 192 have been added to the application. The new claims specify additional details of the nature of the movement and the indicating data.

In particular, claim 179 refers to the movement including at least one stroke. The use of strokes within Dymetman is not disclosed, and in any case as Dymetman operates to obtain discrete page IDs and locations upon user clicks, the techniques of Dymetman are not suitable for detecting pen strokes.

Claim 180 clarifies that a stroke is initiated when the pen is placed in an operative position relative to the interface surface and is completed when the pen is removed from the operative position. Again, this is not disclosed in Dymetman which would require the user to position the pen, click, move the pen, click, etc. This does not therefore allow a stroke to be determined based on placing the pen in operative position with the interface surface. Instead, this would require discrete positioning of the pen at a number of locations with corresponding clicks at each location to cause location to be determined. It is clear from this, that this would not therefore be suitable for capturing pen strokes.

Claims 181 clarifies that the indicating data is indicative of a sequence of pen positions, providing further distinctions if combined with claim 180.

Claim 182 further defines that the indicating data is indicative of the relative time at which each pen position is determined, which is not disclosed in Dymetman, whilst Claim 183 describes the indicating data is indicative of the number of strokes with each stroke being represented by respective sequence of pen positions. Claim 184 relates to each stroke being further represented by an identifier indicative of the interface surface, and finally Claim 185 specifies that the series of stroke represent hand written text which again is not described in Dymetman.

Claims 186 to 192 are equivalent system claims dependent on claim 88 and accordingly, similar arguments therefore apply to those discussed above.

A basis for the inclusion of these additional claims can be found on pages 30 to 32 of the specification. In particular, pages 30 to 32 discuss in detail how the pen operates to capture a series of strokes as a sequence of time stamped pen positions, with each stroke also being tagged with the page ID of the netpage. This portion of the specification goes on to clarify that this occurs when the coded data is read when the pen executes movement. This is in complete contrast to Dymetman in which the pen is only operational when stationary and when the user clicks as previously described.

In view of the Examiner's prior objections in paragraph 4 onwards, we anticipate that the Examiner may object to revised claims on the basis of Dymetman and further in view of Wolff et al which refers to manual entry of data.

In this regard, we would submit that Wolff et al is not at all relevant to the claims as revised. In particular, the claims as revised highlight that the indicating data, which is indicative of the movement, is generated using coded data sensed by the sensing device. In contrast to this, in the description of Wolff et al, the sensing of movement is achieved using transducers and gyroscopes. Thus, movement of Wolff et al is not achieved by sensing coded data on an interface surface.

We therefore respectfully submit that a combination of Dymetman et al and Wolff et al teaches the provision of a sensing device which is able to sense coded data provided on an interface surface and which additionally includes sensors, such as transducers, gyroscopes, or the like, to determine movement of the pen. A combination of these two documents does not therefore teach a sensing movement of the sensing device using coded data.

In view of this, we respectfully submit that the claims as revised are both novel and inventive over the cited prior art.

Finally, we wish to reiterate that the interface surface of the present invention includes coded data and information printed substantially simultaneously. This is distinctly different to the interface surface provided in Dymetman, in which the coded data is printed by a publisher, with the visible information being printed in a separate step. This relates to a distinct difference in mode of operation in that the present invention allows the interface surface to be printed on blank paper using a printer with infra-red ink printing facilities. In contrast to this, in Dymetman the interface surface in the form of a coded data substrate must be provided separately with the information being printed thereon. This requires end users to purchase costly preformatted coded data substrates.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

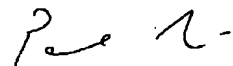
Very respectfully,

Applicant:



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